

Samuel Rosenthal (pro hac vice)
sam.rosenthal@nelsonmullins.com
Nelson Mullins Riley & Scarborough LLP
101 Constitution Ave., N.W.
Washington, D.C. 20001
Telephone: +1 202-689-2915
Facsimile +1 202-712-2860

Phil Busman (pro hac vice)
Phil.busman@nelsonmullins.com
Nelson Mullins Riley & Scarborough LLP
101 Constitution Ave., N.W.
Washington, D.C. 20001
Telephone: +1 202-689-2988

Cory E. Manning (State Bar # 213120)
cory.manning@nelsonmullins.com
Nelson Mullins Riley & Scarborough LLP
1320 Main St., 17th Floor
Columbia, SC 29201
Telephone: +1 803-255-5524
Facsimile +1 803-256-7500

Crispin L. Collins (State Bar # 311755)
crispin.collins@nelsonmullins.com
Nelson Mullins Riley & Scarborough LLP
19191 S. Vermont Ave., Suite 301
Torrance, CA 90502
Telephone: +1 424-221-7407
Facsimile +1 424-221-7499

Christian J. Myers (pro hac vice)
Josh.myers@nelsonmullins.com
Nelson Mullins Riley & Scarborough LLP
101 Constitution Ave., N.W.
Washington, D.C. 20001
Telephone: +1 202-689-2991

Attorneys for Plaintiffs
Planet Aid Inc. and Lisbeth Thomsen

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PLANET AID INC.; and LISBETH THOMSEN,

Case No. 17-cv-03695-MMC

Plaintiffs.

**RESPONSE TO MOTION BY
DEFENDANTS TO EXTEND THE TIME
LIMIT UNDER FED.R.CIV.P. 54(d)(2)(B)**

V

REVEAL, CENTER FOR INVESTIGATIVE REPORTING; MATT SMITH; and AMY WALTERS.

Defendants.

Plaintiffs hereby respond to the motion by Defendants to extend the time for filing an application pursuant to Fed.R.Civ.P. 54(d)(2)(B) so that they may file an application for fees and expenses pursuant to California Code of Civil Procedure § 425.16(c) (Dkt. Entry 311). Defendants failed to confer with counsel for Plaintiffs for filing the motion, as required by local rules. Plaintiffs nevertheless consent to the requested thirty-day extension without waiving their

1 argument that fees and expenses are not recoverable under Section 425.16.

2 Dated: April 1, 2021

3 Respectfully submitted,
NELSON, MULLINS, SCARBOROUGH & RILEY

4
5 By: /s/ Samuel Rosenthal
6 Sam Rosenthal (pro hac vice)

7 Attorneys for Plaintiffs Planet Aid, Inc.
and Lisbeth Thomsen

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SQUIRE PATTON BOGGS (US) LLP
55 South Flower Street, 31st Floor
Los Angeles, California 90071